

SUMMARY OF PROVISIONS OF CB “MAIB” JSC POLICY IN THE FIELD OF PREVENTING AND COMBATING MONEY LAUNDERING AND TERRORIST FINANCING,

approved by the decision of the Bank's Board of Directors of 31.07.2024 (minutes no. 06),
in force from the date of approval, amended on 27.03.2025

By the Policy in the Field of Preventing and Combating Money Laundering and Terrorist Financing (hereinafter "Policy"), CB „MAIB” JSC (hereinafter „Bank” or „**maib**”) is committed to initiating and maintaining business relationships with its customers and partners in compliance with applicable legislation and the highest international standards in this area, such as Recommendations of the Financial Action Task Force (FATF-GAFI), the Basel Committee on Banking Supervision documents, EBA (European Banking Authority) Guidelines, and Wolfsberg Group documents, related to beneficial owner's identification; risk-based approach within the process of money laundering risk management; correspondent banking relationships; customers transactions' monitoring; compliance with international restrictive measures and applicable international sanctions.

According to the Policy provisions, the Bank determines factors, which give rise to increased money laundering and terrorist financing risks, and which determine the need to apply enhanced customer due diligence measures. In addition, the Bank determines the categories of customers that shall be considered unacceptable for the initiation or continuation of the business relationship, as well as the limits related to customers' transactions, including occasional customers (number of transactions, amount limits for a single operation and/or cumulative amount for a period of time etc.).

Towards the transactions or in business relationship with politically exposed persons, with family members of politically exposed persons and with persons known to be close associates to politically exposed persons, additionally to standard due diligence measures, **maib** undertakes measures provided by normative acts adopted in this domain by the National Bank of Moldova and the Office for Prevention and Fight Money Laundering (local FIU).

The Bank pays particular attention to customers and transactions in and/or from jurisdictions that do not require the application of know-your-customer and related record-keeping procedures, and to jurisdictions in which applying of such procedures is not overseen in a prudential manner by the competent regulatory and supervisory authorities. In business relationship or in case of transactions involving customers /partners and financial institutions from high-risk countries (jurisdictions), designated /monitored by the Financial Action Task Force (FATF-GAFI) and by the competent institutions of European Union, the Bank undertakes measures provided by legislation, related to mitigation of risks associated with those countries (jurisdictions).

The Bank ensures compliance to the requirements of the Law on the applying of international restrictive measures no.25 of 04.03.2016, including freezing of funds and economic resources that are owned or held by subjects of restrictions or are under their direct or indirect control. Additionally, **maib** acknowledges the importance of and applies the requirements of the international financial sanctions adopted by the United Nations (UN), the European Union (EU), the Office of Foreign Assets Control, U.S. Department of the Treasury (OFAC) and the United Kingdom Office of Financial Sanctions Implementation (OFSI UK).

The Bank does not establish business relationships with individuals or legal entities – subjects of restrictions according to the legislation of the Republic of Moldova, with persons in respect to whom there are evidences, documented information that they are associated to subjects of restrictions, and with legal entities in respect to whom there is a documented information that they are under control of a subject of restrictions. Also, the Bank does not establish business relationships with individuals or legal entities included in at least one of the international financial sanctions lists adopted by the UN, EU, OFAC (SDN List) and OFSI UK, or with legal entities controlled by such persons, as well as does not accept the processing of any operations or transactions that might violate the international financial sanctions' regime (including operations or transactions initiated by, or in behalf of or through persons included in at least one of those lists).

The Bank does not enter into business relationship, including opening of accounts and acceptance and/or movement of any funds through accounts, and applies immediately restrictive measures with respect to assets, including those derived from or generated by assets owned or controlled, directly or indirectly, by persons, groups and entities, involved in terrorist activities and proliferation of weapons of mass destruction, subject to restrictive measures, included in the UN Security Council, EU lists and supplementary list of the Intelligence and Security Service of the Republic of Moldova, as well as legal entities owned or controlled, directly or indirectly, by such persons, groups and entities.

The Bank does not admit the opening of anonymous accounts, anonymous safe boxes, accounts in fictitious names, issuing and accepting payments performed by using anonymous prepaid cards; does not admit the initiation or continuation of business relationships with fictitious banks (shell banks) or banks that are known to allow shell banks to use their accounts or that provide anonymous accounts for their customers.

The Bank terminates unilaterally business relationships with customers, whose transactions or activities present an increased risk of the Bank's involvement in money laundering or terrorist financing activities/transactions.

The Bank ensures informing and reporting to the Office for Prevention and Fight against Money Laundering of activities or transactions that fall under the Law on prevention and combating money laundering and terrorist financing No.308/2017, within the time limits provided for by the legislation.

Maib applies in its activity FATCA (Foreign Account Tax Compliance Act) requirements, according to the provisions of the Type 2 Intergovernmental Cooperation Agreement between the Government of the Republic of Moldova and the USA Government to facilitate the implementation of the provisions of this Act and of the legislation in force, which regulates the application of the indicated Act's provisions. In addition, the Bank ensures compliance with requirements of the Law on the implementation of the provisions of the multilateral Agreement of the competent authorities for the automatic exchange of information on financial accounts No.69/2023 and of normative acts issued in order to apply it.

The Bank retains all documents and information necessary in order to comply with customer due diligence measures regarding the customers and beneficial owners, including data on the customers' transactions, for a period of 5 years after the termination of business relationship or after the date of occasional transaction performance. At the request of the competent supervisory authorities, the storing period for certain types of documents and information relating to customers and their operations may be extended for a period that will not exceed 5 years additionally.

Personal data processed within **maib** are treated in accordance with the provisions of the legislation in force and applicable international rules governing the personal data protection.

In the Bank is appointed the person – Management Board member, as person responsible for ensuring compliance of the **maib**'s Policy and other internal regulations with the requirements of legislation in force on preventing and combating money laundering and terrorist financing.

Each employee of **maib**, regardless of his /her position and the business line, has access to training in order to understand and prevent the phenomenon of „money laundering and terrorist financing”, the training programs being planned depending on the level of employees' involvement in these activities. The Bank ensures that employees responsible for customer due diligence for the purpose of preventing money laundering and terrorist financing have access to internal or external professional training activities, including relevant qualification and accreditation courses.

The Bank ensures independent assessment of the Policy's implementation, of the adequacy and compliance of the Bank activity with the program on preventing and combating money laundering and terrorist financing.

All the activities carried out within the Bank in the field of preventing and combating money laundering and terrorist financing, are based on the main Policy's principles, among which are the following: establishing and implementing procedures to identify, assess and control money laundering and terrorist financing risks and taking measures to minimize them, applying the risk-based approach; defining internal customers' acceptance procedures, based on the "Know Your Customer" principles, the gradual acceptance procedures and the hierarchical level of approval of the initiation /continuation of business relationship with clients according to the associated risk level, the types of products and services that can be provided to each category of clients; defining procedures for ongoing monitoring of customers' transactions, including in an automated way, using dedicated software, in order to detect significant, complex and unusual transactions and potentially suspicious activities and transactions that fall under the Law on preventing and combating money laundering and terrorist financing No.308 of 22.12.2017; defining procedures that ensure compliance with the legislation of the Republic of Moldova in the field of international restrictive measures' applying, and with the requirements of international sanctions adopted by the UN, EU, OFAC and OFSI UK, applicable to the Bank; and identification, prevention and management of risk related to non-compliance to the relevant sanctions' requirements, including through implementation of automated screening of customers and transactions against the lists of subjects of restrictions and against the international sanctions lists applicable to the Bank.